



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



428697

**FEB 27 2012**

REPLY TO THE ATTENTION OF  
SE-5J

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Donald Haugen  
c/o Michael B. Ortega  
Lewis, Reed & Allen, P.C.  
136 E. Michigan Ave., Suite 800  
Kalamazoo, MI 49007

Donald Haugen  
10134 West O Avenue  
Kalamazoo, MI 49009

Re: Request for Information Pursuant to Section 104 of CERCLA for the Texas Township Drum Site in Kalamazoo, Kalamazoo County, Michigan; Site Spill Identification Number: B5PY

Dear Mr. Haugen:

This letter seeks your cooperation in providing information and documents relating to the contamination of the Texas Township Drum Superfund Site in Kalamazoo, Michigan (Site). A Superfund site is a site contaminated with high levels of hazardous substances that may present a threat to human health or the environment.

We encourage you to give this matter your immediate attention and request that you provide a complete and truthful response to this Information Request and enclosed questions (Enclosure B) within twenty-one (21) days of your receipt of this letter.

The United States Environmental Protection Agency conducted a time-critical removal action at the Site. EPA is seeking to obtain information concerning the generation, storage, treatment, transportation and methods used to dispose of such substances that were released or had the potential to be released from the Site. In addition, EPA is investigating activities, materials and parties that contributed to contamination at the Site. EPA believes that you might have information that may assist the Agency in its investigation of the Site.

**Description of Legal Authority**

The federal "Superfund" law (the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. § 9601 *et seq.*, commonly referred to as "CERCLA" and "Superfund") gives EPA the authority to, among other things: (1) assess contaminated sites, (2) determine the threats to human health and the environment posed by each site and (3) clean up those sites in the order of the relative threats posed by each.

### Information Request

Under Section 104(e)(2) of CERCLA, 42 U.S.C. § 9604(e)(2), EPA has broad information gathering authority which allows EPA to require persons to furnish information or documents relating to:

- (A) The identification, nature and quantity of materials which have been or are generated, treated, stored or disposed of at a vessel or facility or transported to a vessel or facility.
- (B) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility.
- (C) Information relating to the ability of a person to pay for or to perform a cleanup.

While EPA seeks your cooperation in this investigation, compliance with the Information Request is required by law. Please note that false, fictitious or fraudulent statements or representations may subject you to civil or criminal penalties under federal law.

Some of the information EPA is requesting may be considered by you to be confidential. Please be aware that you may not withhold the information upon that basis. If you wish EPA to treat the information confidentially, you must advise EPA of that fact by following the procedures outlined in Enclosure A, including the requirement for supporting your claim for confidentiality.

If you have information about other parties who may have information which may assist the Agency in its investigation of the Site or may be responsible for the contamination at the Site, that information should be submitted within the time frame noted above.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1995, 44 U.S.C. § 3501 *et seq.*


Instructions on how to respond to the questions in Enclosure B to this document are described in Enclosure A. Your response to this Information Request should be mailed to:

Carol Ropski  
U.S. Environmental Protection Agency  
Enforcement Services Section 1, SE-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

If you have additional questions about the history of the Site, the nature of the environmental conditions at the Site or the status of cleanup activities, please contact Steven Kaiser at 312-353-3804. However, if you have specific questions about the Information Request, please contact Carol Ropski at 312-353-7647.

We appreciate and look forward to your prompt response to this Information Request.

Sincerely,



Sharon Jaffess, Chief  
Enforcement and Compliance Assurance Branch

Enclosures

Enclosure A  
Information Request  
to Donald Haugen

Instructions

1. Answer Every Question Completely. A separate response must be made to each of the questions set forth in this Information Request. For each question contained in this letter, if information responsive to this Information Request is not in your possession, custody or control, please identify the person(s) from whom such information may be obtained.
2. Number Each Answer. Precede each answer with the corresponding number of the question and the subpart to which it responds.
3. Provide the Best Information Available. Provide responses to the best of Respondent's ability, even if the information sought is not written down or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent is considered non-compliant with this Information Request.
4. Identify Sources of Answer. For each question identify (see Definitions) all the persons and documents that you relied on in producing your answer.
5. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to Section 104(e) of CERCLA that you supplement your response to EPA.
6. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F), and Section 3007(b) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6927(b), and 40 C.F.R. § 2.203(b).

If you make a claim of confidentiality for any of the information you submit to EPA, you must prove that claim. For each document or response you claim confidential, you must separately address the following points:

- a) The portions of the information alleged to be entitled to confidential treatment;
- b) The period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event or permanently);

- c) Measures taken by you to guard against the undesired disclosure of the information to others;
- d) The extent to which the information has been disclosed to others and the precautions taken in connection therewith;
- e) Pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
- f) Whether you assert that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp or type "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise non-confidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all non-confidential information, including any redacted versions of documents, is in one envelope and all materials for which you desire confidential treatment are in another envelope.

All confidentiality claims are subject to EPA's verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by Section 104(e) of CERCLA. If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to you.

7. Disclosure to EPA Contractor. Information which you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. § 2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that EPA may disclose all responses to this Information Request to one or more of its private contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information which you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within fourteen (14) days of receiving this Information Request.

8. Personal Privacy Information. Personnel and medical files, and similar files, the disclosure of which to the public may constitute an invasion of privacy, should be segregated from your responses, included on separate sheet(s) and marked as "Personal Privacy Information."

9. Objections to Questions. If you have objections to some or all the questions within the Information Request letter, you are still required to respond to each of the questions.

## Definitions

The following definitions shall apply to the following words as they appear in this Information Request.

1. The term "**arrangement**" means every separate contract or other agreement between two or more persons, whether written or oral.
2. The term "**documents**" includes any written, recorded, computer-generated or visually or aurally reproduced material of any kind in any medium in your possession, custody or control, or known by you to exist, including originals, all prior drafts, and all non-identical copies.
3. The term "**hazardous substance**" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
4. The term "**identify**" means, with respect to a natural person, to set forth: (a) the person's full name; (b) present or last known business and home addresses and telephone numbers; (c) present or last known employer (include full name and address) with title, position or business.
5. With respect to a corporation, partnership or other business entity (including a sole proprietorship), the term "**identify**" means to provide its full name, address and affiliation with the individual and/or company to whom/which this request is addressed.
6. The term "**material**" or "**materials**" shall mean any and all objects, goods, substances or matter of any kind, including but not limited to wastes.
7. The term "**person**" shall include any individual, firm, unincorporated association, partnership, corporation, trust or other entity.
8. The term "**pollutant or contaminant**" shall include, but not be limited to, any element, substance, compound or mixture, including disease-causing agents, which after release into the environment will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations; except that the term "pollutant or contaminant" shall not include petroleum.
9. The term "**real estate**" shall mean and include, but not be limited to the following: land, buildings, a house, dwelling place, condominium, cooperative apartment, office or commercial building, including those located outside the United States.

10. The term "**release**" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.

11. The term "**Site**" shall mean the Texas Township Drum Superfund Site located at 10135 West O Avenue, Kalamazoo, Kalamazoo County, Michigan.

12. The term "**waste**" or "**wastes**" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances and pollutants or contaminants, whether solid, liquid or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

13. The term "**you**" or "**Respondent**" shall mean Donald Haugen.

Enclosure B  
Requests

1. Identify all persons consulted in the preparation of the answers to these Information Requests.
2. Identify all documents consulted, examined or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.
3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.
4. Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants or contaminants and damages resulting therefrom.
5. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous substances by you, your contractors, or prior owners and/or operators.
6. Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials? If the answer to the preceding question is anything but an unqualified "no", identify:
  - a) The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance;
  - b) Who supplied you with such hazardous substances, including name and contact information for each supplier;
  - c) How such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;
  - d) When such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;
  - e) Where such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
  - f) The quantity of such hazardous substances used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.



7. Describe the nature of your activities or business at the Site, with respect to purchasing, receiving, processing, storing, treating, disposing or otherwise handling hazardous substances or materials at the Site.
8. Identify all generators and transporters of hazardous wastes to the Site. In addition, identify:
- a) The address of each generator or transporter;
  - b) A contact name and telephone number for each generator or transporter;
  - c) The amount of each hazardous substance, pollutant or contaminant from each generator or transporter; and
  - d) The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance from each generator or transporter.
9. Provide all documentation, including invoices, bills of lading, ledgers, correspondence, contracts, etc., documenting the generators or transporters of and the amounts and composition of the hazardous wastes at the Site.
10. Enclosure C is a brochure for Environmental Network, Inc. that includes a list of transportation companies on Page 10. Identify any of the companies identified in the brochure that may have transported hazardous substances to your facility. In addition, identify:
- a) The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance;
  - b) How such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;
  - c) When such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;
  - d) Where such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
  - e) The quantity of such hazardous substances used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.
11. What was your relationship with Chemical Assistance, Inc.?

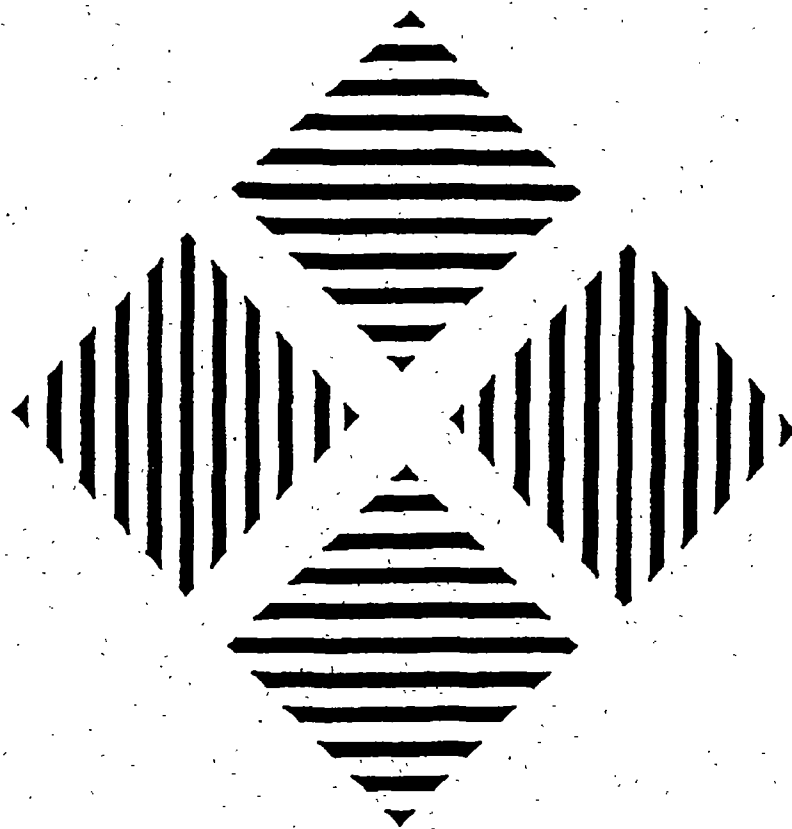
12. Describe your relationship with Chemical Assistance, Inc. with respect to purchasing, receiving, processing, storing, treating, disposing or otherwise handling hazardous substances or materials at the Site.

13. What was your relationship with Environmental Network, Inc?

14. Describe your relationship with Environmental Network, Inc. with respect to purchasing, receiving, processing, storing, treating, disposing or otherwise handling hazardous substances or materials at the Site.

Enclosure C

Environmental Network, Inc. Brochure



## **ENVIRONMENTAL NETWORK, INC.**

221 Dino Drive  
Suite B  
Ann Arbor, Michigan 48103

Telephone: (800) 535-6650  
Facsimile: (800) 535-0105

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**ENVIRONMENTAL NETWORK, INC.**

**221 Dino Drive**

**Suite B**

**Ann Arbor, Michigan 48103**

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**Environmental Network, Inc.** is an association of professionals dedicated to serving the needs of academic institutions in the area of regulatory compliance and hazardous waste management. We offer a complete line of services to develop a waste management program customized to fit your individual needs. Through our network of services, we provide you with reliable, efficient and environmentally safe solutions to your chemical waste concerns.

**Environmental Network, Inc.** offers years of successful waste management experience, a direct and specific result of the unsurpassed expertise and dedication of our people. From the highly trained environmental chemists to the friendly and knowledgeable support staff, we represent a genuine commitment to quality service. We are a company that cares . . . about you and about our environment.

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**LOCAL**

Telephone: (313) 426-9121

Facsimile: (313) 426-9190

**TOLL FREE**

Telephone: (800) 535-6650

Facsimile: (800) 535-0105

## **COMPLETE AND CUSTOMIZED SERVICE**

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**Environmental Network, Inc.** provides reliable, responsible, and complete waste management service. Our personnel and facilities are fully equipped with the expertise and resources to effectively meet your hazardous waste management needs. Our network of environmental services include:

### ***Consulting Services***

- Regulatory Compliance
- EPA Permitting
- Internal Site Audits
- Laboratory Assessments
- Inventory Control Programs
- Waste Minimization Techniques
- Waste Management Inservices
- HAZMAT Training
- OSHA and EPA compliance
- Right-to-Know Training
- Safety Training

### ***Analytical Services***

- Hazardous Waste Analysis
- Waste Characterization
- Waste Stream Approvals
- Inorganic Analysis
- Metals Analysis
- RCRA Waste Analysis
- TCLP Analysis
- Organic Analysis (GC/GCMS)
- Air Quality Testing
- Ground Water Monitoring
- Soil Testing
- Field Sampling

### ***Disposal Services***

- Disposal Options
- Lab Packaging
- Documentation
- Transportation

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## CONSULTING SERVICES

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### **Regulatory Compliance/ EPA Permitting**

With the increased complexity of federal and state regulations, it's easy to see why some generators can feel overwhelmed by what is required of them. That is one reason **Environmental Network, Inc.** has technical service associates available to address your unique waste management concerns and ensure your waste is managed safely and in full compliance with all environmental regulations. We can assist you with compliance in all areas including EPA permitting and documentation, waste storage and handling, employee training, emergency procedures, and the transportation and disposal of your waste.

The following information serves as a guideline to determine your generator status and what regulations you must meet. For more specific information, contact an ENI representative.

1. **Conditionally Exempt Small Quantity Generator**

-- Generates no more than 100 kg of hazardous waste in any month and never accumulates 1000 kg or more

1. Evaluate your waste and keep records of your waste evaluation.
2. Never accumulate more than 1000 kg of hazardous waste at your site.  
(If you do, you are subject to Small Quantity Generator Regulations.)

2. **Small Quantity Generator**

-- Generates from 100 kg to less than 1000 kg of hazardous waste in any month and never accumulates 1000 kg or more

1. Evaluate your waste and keep records of your waste evaluation.
2. Never accumulate over 1000 kg of hazardous waste at your site, and never exceed the time limits for waste accumulation.
3. Package and label hazardous wastes properly (U.S. DOT and hazardous waste regulations).
4. Use proper containers for accumulated waste.
5. Obtain a federal EPA generator identification number.
6. Ship wastes to a licensed hazardous waste facility for proper disposal.
7. Maintain waste records for three years.
8. Meet emergency preparedness requirements.

3. **Fully Managed Generator**

-- Generates 1000 kg per month or more

1. Evaluate your waste and keep records of your waste evaluations.
  2. Remove accumulated wastes over 1000 kg within 90 days.
  3. Package and label hazardous wastes properly (U.S. DOT and hazardous waste regulations).
  4. Use Uniform Hazardous Waste Manifest (shipping paper).
  5. Provide secondary containment for accumulated liquid hazardous waste.
  6. Obtain a federal EPA generator identification number.
  7. Ship wastes to a licensed hazardous waste facility for proper disposal.
  8. Maintain waste records for three years.
  9. Prepare contingency and emergency preparedness plan.
  10. Provide HAZMAT training for employees.
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## CONSULTING SERVICES

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### ***Internal Site Audits/Laboratory Assessments***

Our consultants at **Environmental Network, Inc.** are available to assist you in identifying problem areas in your laboratory. From your storage area to your ventilation operation and safety plans, we are there to help you identify "trouble spots" and suggest ways to improve and ensure compliance. ENI crews are also available to compile a complete inventory of your materials for your material management programs so you may more easily track ordering, disposal, and storage procedures. Some areas of assessment include:

General laboratory equipment  
Ventilation operation  
Safety techniques  
Laboratory Standard compliance

Laboratory safety equipment  
Material handling techniques  
Inventory control  
OSHA Standard compliance

### ***Inventory Control Programs***

The inventory process may reveal that many storage areas contain excess laboratory chemicals. The accumulation is often the result of ordering procedures used by Researchers, Instructors, and/or Organizations. Our technical representatives at **Environmental Network, Inc.** are available to assist clients in avoiding and eliminating excess chemicals, which can increase safety standards and lead to a reduction of liability. We are here to suggest ways to avoid excess chemicals and control future waste.

### ***Waste Minimization Techniques***

**Environmental Network, Inc.** will work to solve your current waste problems and assist you in substantial cost savings by reducing the volume of hazardous wastes you produce. We concentrate on solving your waste handling challenges, not only to solve your current waste problems but develop a plan to minimize your future disposal needs. Our services in this area include recommendations for lowering costs through:

Modification of Ordering Procedures  
Product Substitution  
Modification of Laboratory Procedures  
Recovery, Reuse, and Recycling Options

## CONSULTING SERVICES

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### ***Waste Management Inservices/HAZMAT Training***

We recognize the importance of sharing the expertise of our technical, regulatory, and sales teams in order to help clients understand the ever-changing and complex regulations of the industry. This is why **Environmental Network, Inc.** offers waste management seminars to provide comprehensive training and education to employees who must handle the management of hazardous materials at your institution. Through these efforts, we continue to keep customers informed and provide them with the knowledge required to comply with the evolving OSHA, EPA, DOT, CERCLA, and SARA regulations. These programs offer cost-effective, up-to-date training techniques that help reduce your company's current risks and future liability. Some of the programs provided by ENI include:

OSHA Safety Training  
OSHA and EPA Compliance  
Confined Space Entry  
Right-to-Know Training  
Emergency Response/Hazard Communication

Emergency Spill Response  
Site Safety Plan Development  
Hazardous Materials Management  
Hazardous Waste Handling  
RCRA Generator Liability

Workshops are offered at all levels, from basic to advanced, and can be tailored to your specific needs. Tailored educational and training programs are conducted at your location and are generally cost-effective when more than ten people will attend. Our instructors are accomplished professionals with extensive experience in the subject matter they are presenting. Whatever your training needs, **Environmental Network, Inc.** will assist your institution with meeting the challenges of maintaining a safe and healthy work environment. Please contact an ENI representative for a cost estimate and proposal.

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### **MISSION...**

Our mission is to foster education and training relative to hazardous and potentially hazardous materials, hazardous waste, and any other environmental concerns you may have.

The mission of our staff is not only dedicated to assisting you in satisfying the letter of the law, but to provide your employees and management with the proven techniques and knowledge they need to work safely.

Our mission is to keep you informed and up-to-date with environmental regulations and practices so that together we can promote the safest and most healthy environment for everyone.

With our programs, the needs of both the environment and your institution can be met . . . and both can flourish.

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## ANALYTICAL SERVICES

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**Environmental Network, Inc.** offers hazardous waste analysis, organic analysis, and inorganic analysis. All analytical procedures are performed in strict accordance with EPA, CFR, ASTM, and Standard Methods procedures. Using the most advanced technologies, our laboratories provide information about samples to help customers and ENI personnel make informed handling decisions. ENI utilizes experienced personnel and automated equipment to consistently produce cost-effective environmental services.

### *Hazardous Waste Analysis*

**Environmental Network, Inc.** has capabilities for determining the characteristics of hazardous wastes using state-of-the-art techniques. These methods include EP toxicity, reactivity, corrosivity, and ignitability. Extraction options include TCLP, Zero headspace (ZHE), acid and neutral leachates, along with ultra sonic extractions. ENI will provide complete analytical services that will aid in "cradle to grave" compliance with regulations for waste characterization and necessary determinations for acceptance at the designated disposal facilities.

### *Inorganic Analysis*

**Environmental Network, Inc.** provides a diverse range of services from standard colorimetric procedures to sophisticated instrumental analyses. Our lab can perform analysis of metallic species from Aluminum to Zinc. Multiple elements can be determined from along the most complex matrices. Ion chromatography, atomic absorption, Zeeman Graphite Furnace, Cold Vapor, and inductively coupled plasma (ICP) are just a few of the many lab techniques in the absorptions and emmissions of your samples. Inorganic capabilities include:

Metals Analysis  
EPA Priority Metals

RCRA Metals  
TCLP Metals

### *Organic Analysis*

**Environmental Network, Inc.** performs instrumental analysis for organic materials using state-of-the-art technology. From the bulk analysis of industrial waste solvents by gas chromatography (GC) to ultra-trace analysis of ground water through gas chromatography mass spectrometry (GCMS), we handle your analytical needs utilizing the most precise and accurate instrumentation available. Our organic capabilities include:

Air Contaminant Assessment  
Ground Water Analysis  
Semivolatiles: Acid/Base - Neutral Analysis

Soil Testing  
Solvent Scan

### *Field Sampling*

**Environmental Network, Inc.** has qualified personnel to provide you with excellent on-site support for sampling, monitoring, and analysis. Samples are collected according to EPA guidelines. Proper container and sampling equipment are chosen based upon analysis required. Proper chain of custody and field information is completed for every sample taken by ENI. Some of the sampling services offered include:

Air Quality Monitoring  
Ground Water Monitoring  
Soil Sampling  
Sampling for Asbestos and other Compounds

Exposure Detection  
Wastewater Monitoring  
Hazardous Waste Sampling

## DISPOSAL SERVICES

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### *Disposal Options*

One of the primary concerns facing the world today is how to handle hazardous waste while preserving human health and the environment. **Chemical Assistance, Inc.**, the disposal division of **Environmental Network, Inc.**, offers a full complement of environmentally sound, cost-effective, and safe treatment/disposal options. Our primary emphasis lies in the recycling and reclamation of unwanted materials. When these options are not appropriate, wastes are taken to fully licensed and insured disposal facilities offering kiln fire incineration or chemical fixation treatment. Great care and consideration are taken to manage your waste in a safe, cost-effective, and environmentally sound manner.

All materials are handled in one of the following methods:

#### **1. Resale**

Many laboratory chemicals remain unopened and unused for several years and eventually become classified as excess or waste. Through our network of educational institutions and industries, we are able to find outlets for these materials. Using physical inspection and analysis, CAI can determine if resale is a suitable option for your unwanted materials.

#### **2. Recycling/ Reclamation**

A significant amount of chemical waste we handle is recycled, utilizing various techniques to reclaim valuable metals found in some customers' wastes. Through the treatment options of heavy metal and solvent reclamation and fuel blending, materials are processed and returned to the manufacturing industry while wastes from the recovery process are blended into fuels suitable for use in industrial furnaces. It is good economics for us, our customers and our community.

#### **3. Disposal**

When disposal is the only option, waste materials are taken to fully licensed and insured disposal facilities offering kiln fire incineration or chemical fixation treatment. Incineration is the best demonstrated treatment method for destroying most hazardous and non-hazardous waste, offering complete and permanent destruction. Chemical fixation treatment transforms your waste into an ecologically compatible solid that is placed in an approved landfill. With this treatment option, waste materials are bound up chemically by the process, rendering the material below TCLP levels, thereby reducing your liability. Both methods provide safe, effective, low-liability alternatives for your waste materials.

Whether we recycle or treat for disposal, all waste streams are processed with professional care, with safety in mind, and in accordance with all applicable laws, rules, and regulations.

By utilizing these disposal options and working in partnership with our customers, **Chemical Assistance, Inc.** is meeting the challenge of providing solutions to waste management problems and protecting our environment.

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## DISPOSAL SERVICES

### *Lab Packaging*

Chemical Assistance, Inc. technical service teams provide management of the collection and packaging of aged chemicals, reagents and other laboratory wastes which pose special disposal problems. Our lab pack program is structured to offer the safest and most cost-effective options for the handling of your material.

Some examples of materials handled by Chemical Assistance, Inc. include:

Unknowns	Heavy Metals	Solvents
Explosives	Lachrymators	Toxic Materials
Pyrophorics	Reactive Chlorides	Flammable Solids
Lecture Bottles	Gas Cylinders	Bases
Acids	Shock Sensitive Materials	PCBs

Materials we are UNABLE to accept include:

High-level Radioactives  
Dioxin-bearing Waste (F027)

Prices for disposal are based on the type of material, amount of material, and number of containers. To obtain a firm price quotation for the removal and disposal of waste, generators should submit a material inventory list in the following format:

TYPE OF MATERIAL	CONTAINER SIZE	NO. OF CONTAINERS	CONDITION
Phosphoric Acid	5 gal	2	Good
Sodium Hydroxide	1 lb	3	Excellent
Unknown (white crystal)	25 gram	1	Poor
Formaldehyde	55 gal	2	Fair

Chemical Assistance, Inc. field chemists will identify the materials to be disposed of and follow proper lab packaging techniques and regulations. All items identified for removal will be segregated prior to packaging into appropriate hazard class and sub-categorized into suitable disposal considerations.

Unknown materials which cannot be classified by visual inspection will undergo on-site screening to determine the appropriate hazard class. If necessary, these items will be transported to our facility for further identification.

## DISPOSAL SERVICES

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### *Documentation*

Chemical Assistance, Inc. coordinators will work with you to satisfy all federal, state, and local regulations for the proper shipping and disposal of materials. We will provide completed manifests and labels as well as supplemental paperwork requested by the designated disposal facility.

All documentation will be available in advance for your review.

### *Transportation*

All materials will be packaged and shipped in accordance with all Department of Transportation shipping regulations. A fully permitted, insured and DOT licensed transporter will be provided by Chemical Assistance, Inc.

In some instances, a "milk run" pick up may be arranged. This involves the collection of small quantities of hazardous waste from several different generators. Chemical Assistance, Inc. can often link two or more organizations in your geographical area to make a series of stops on the same day rather than sending a truck for each individual pick up. Milk run pick ups can often reduce costs by as much as 10%. For maximum feasibility, the locations should be in close proximity. Each generator maintains a separate manifest for its hazardous waste, just as if it were a separate pick up.

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## QUALITY...

Quality means proper handling of your waste stream, on-time pick ups, trained and professional personnel, correct documentation, and all those things which make a sound business relationship.

Quality means more to us than merely meeting government regulations.

Quality service begins with quality people. Our dedicated technical personnel combined with the friendly and knowledgeable sales staff will provide you with the quality service you deserve.

To us, Quality means doing it right the first time.

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## GENERAL TRANSPORTATION

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### *Transportation Contractors*

**Environmental Network, Inc. and Chemical Assistance, Inc.** will provide you with a fully permitted, insured and Department of Transportation licensed transporter to ship your materials.

- |                                                                                                                                  |                                                                                                                                   |
|----------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|
| <p><b>1. Dart Trucking Company, Inc.</b><br/>OHD 009 865 825<br/>61 Railroad Street<br/>P.O. Box 89<br/>Canfield, Ohio 44406</p> | <p><b>2. Buffalo Fuel Corp.</b><br/>NYD 051 809 952<br/>2445 Allen Avenue<br/>P.O. Box 1038<br/>Niagara Falls, New York 14303</p> |
| <p><b>3. Fort Transfer, Inc.</b><br/>ILD 062 333 752<br/>225 South Maple<br/>P.O. Box 457<br/>Morton, Illinois 61550</p>         | <p><b>4. Chemical Waste Management</b><br/>ILD 000 672 121<br/>3001 Butterfield Road<br/>Oak Brook, Illinois 60521</p>            |
| <p><b>5. Michigan Recovery Systems, Inc.</b><br/>MID 060 975 844<br/>36345 Van Born Road<br/>Romulus, Michigan 48174</p>         | <p><b>6. Westinghouse Environmental</b><br/>21750 Cedar Avenue<br/>Lakeville, Minnesota 55044</p>                                 |
| <p><b>7. Drury Brothers</b><br/>MID 056 988 892<br/>11950 East Newburg Road<br/>Durand, Michigan 48429</p>                       | <p><b>8. Battery Disposal Technology</b><br/>NYD 051 809 952<br/>2445 Allen Avenue<br/>Niagara Falls, New York 14031</p>          |
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## **DISPOSAL FACILITIES**

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### ***Disposal Contractors***

**Environmental Network, Inc. and Chemical Assistance, Inc.** works with the following fully licensed and insured disposal facilities for the handling of your waste materials.

### **STANDARD REGULATED MATERIAL**

- |                                                                                                                |                                                                                                               |
|----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| 1. <b>Petro-Chem Processing, Inc.</b><br>MID 980 615 298<br>515 Lycaste<br>Detroit, Michigan 48214             | 2. <b>Battery Disposal Technology</b><br>MID 000 632 372<br>4255 Research Parkway<br>Clarence, New York 14031 |
| 3. <b>Chem Met Services, Inc.</b><br>MID 096 963 194<br>18550 Allen Road<br>Wyandotte, Michigan 48192          | 4. <b>CyanoKem</b><br>MID 098 011 992<br>12381 Schaefer Avenue<br>Detroit, Michigan 48227                     |
| 5. <b>GSX Recovery Systems</b><br>LAD 079 464 095<br>114 East First Street<br>Crowley, Louisiana 70526         | 6. <b>Michigan Disposal, Inc.</b><br>MID 000 724 831<br>49530 Service Drive<br>Belleville, Michigan 48111     |
| 7. <b>Michigan Recovery Systems, Inc.</b><br>MID 060 975 844<br>36345 Van Born Road<br>Romulus, Michigan 48174 | 8. <b>Chemical Waste Management</b><br>ALD 000 622 464<br>Highway 17 North<br>Emelle, Alabama 35459           |
| 9. <b>Wayne Disposal, Inc.</b><br>MID 048 090 633<br>49350 Service Drive<br>Belleville, Michigan 48111         | 10. <b>Dynecol, Inc.</b><br>MID 074 259 565<br>6520 Georgia Street<br>Detroit, Michigan 48211                 |

### **PCB MATERIAL**

- |                                                                                          |                                                                       |
|------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|
| 1. <b>Westinghouse Environmental</b><br>21750 Cedar Avenue<br>Lakeville, Minnesota 55044 | 2. <b>PPM, Inc.</b><br>10 Central Avenue<br>Kansas City, Kansas 66118 |
|------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|

### **NRC REGULATED MATERIAL**

- |                                                                                               |                                                                                   |
|-----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|
| 1. <b>Chem-Nuclear System, Inc.</b><br>220 Stoneridge Drive<br>Columbia, South Carolina 29210 | 2. <b>WasteChem</b><br>454 South Anderson Road<br>Rock Hill, South Carolina 29730 |
|-----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|
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## REFERENCES

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Atlanta/Fulton County Schools 786 Cleveland Avenue SW Atlanta, GA 30315 .....	Mr. Lowell Jacks (404) 768-3600
La Salle University 1900 West Onley Avenue Box 823 Philadelphia, PA 19141.....	Mr. Fred Long (215) 951-1315
University of Tennessee 2111 Terrace Avenue Knoxville, TN 37996-3509.....	Mr. Casey Anderson (615) 974-5084
Akron Public Schools	Akron, OH
Berry College	Mt. Berry, GA
Bibb County Schools	Macon, GA
DeKalb County Schools	Atlanta, GA
Delaware/Chenango/Madison/Otsego BOCES	Norwich, NY
East Lansing School District	East Lansing, MI
Edgerton Local Schools	Edgerton, OH
Frederick County Public Schools	Winchester, VA
Fremont Community Schools	Fremont, IN
Garnet Valley School District	Concordville, PA
Gary Community Schools	Gary, IN
Guilderland Central School District	Guilderland, NY
Gustavus Adolphus College	St. Peter, MN
Hamilton Local School District	Columbus, OH
Henry Ford Community College	Dearborn, MI
Highland Park School District	Highland Park, MI
Isothermal Community College	Spindale, NC
Kentucky Wesleyan University	Owensboro, KY
Ligonier Valley School District	Ligonier, PA
Methodist College	Fayetteville, NC
Midway College	Midway, KY
Millersville University	Millersville, PA
Nanuet Union Free School District	Nanuet, NY
Newberry County Schools	Newberry, SC
Oakland Community College	Bloomfield Hills, MI
Rochester Community Schools	Rochester, MI
Russell County Schools	Lebanon, VA
Salem-Telkyo University	Salem, WV
St. Marys City Schools	St. Marys, OH
Titusville Area School District	Titusville, PA
Township High School District 211	Schaumburg, IL

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# ACORD. CERTIFICATE OF INSURANCE

LR 03243

ISSUE DATE (MM/DD/YY)

10/05/92

## PRODUCER

Zarvos Agency, Inc.  
24724 Farmbrook Road  
Southfield, MI 48034

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

## COMPANIES AFFORDING COVERAGE

COMPANY LETTER A

CNA

COMPANY LETTER B

COMPANY LETTER C

COMPANY LETTER D

COMPANY LETTER E

## INSURED

CHEMICAL ASSISTANCE, INC  
221 DIND DRIVE, STE A  
ANN ARBOR, MI 48103

## COVERAGE

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTN	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
A	GENERAL LIABILITY <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR. <input type="checkbox"/> OWNER'S & CONTRACTOR'S PROT.	111657987A	08/01/92	08/01/93	GENERAL AGGREGATE \$ 1,000,000 PRODUCTS-COMP/OP AGG. \$ PERSONAL & ADV. INJURY \$ EACH OCCURRENCE \$ 1,000,000 FIRE DAMAGE (Any one fire) \$ 50,000 MED. EXPENSE (Any one person) \$ 5,000
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS <input type="checkbox"/> GARAGE LIABILITY				COMBINED SINGLE LIMIT \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE \$
	EXCESS LIABILITY <input type="checkbox"/> UMBRELLA FORM <input type="checkbox"/> OTHER THAN UMBRELLA FORM				EACH OCCURRENCE \$ AGGREGATE \$
	WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY				STATUTORY LIMITS EACH ACCIDENT \$ DISEASE-POLICY LIMIT \$ DISEASE-EACH EMPLOYEE \$
A	OTHER PROPERTY	111657987A	08/01/92	08/01/93	

## DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

\*\*\*\*\*SAMPLE\*\*\*\*\*  
\*\*\*\*\*SAMPLE\*\*\*\*\*  
\*\*\*\*\*SAMPLE\*\*\*\*\*

## CERTIFICATE HOLDER

SAMPLE

## CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

Mike E. Jones

**ACORD. CERTIFICATE OF INSURANCE**

ISSUE DATE (MM/DD/YY)

8/20/92

**PRODUCER**

VANDERMOLLEN INSURANCE AGENCY, INC.  
17250 Robbins Road, Box 737  
Grand Haven, Michigan 49417

FAX; 616-842-8621

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND  
CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE  
DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE  
POLICIES BELOW.

**COMPANIES AFFORDING COVERAGE**COMPANY LETTER **A** Alpine Assurance Ltd.COMPANY LETTER **B**COMPANY LETTER **C**COMPANY LETTER **D**COMPANY LETTER **E****INSURED**

CHEMICAL ASSISTANCE, INC.  
221 Dino Dr., Suite A  
Ann Arbor, MI 48103

**COVERAGES**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD  
INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS  
CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS,  
EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO. LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
	<b>GENERAL LIABILITY</b> <input type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input type="checkbox"/> OCCUR <input type="checkbox"/> OWNER'S & CONTRACTOR'S PROT.				GENERAL AGGREGATE \$ PRODUCTS-COMP/OP AGG. \$ PERSONAL & ADV. INJURY \$ EACH OCCURRENCE \$ FIRE DAMAGE (Any one fire) \$ MED. EXPENSE (Any one person) \$
	<b>AUTOMOBILE LIABILITY</b> <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS <input type="checkbox"/> GARAGE LIABILITY				COMBINED SINGLE LIMIT \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE \$
	<b>EXCESS LIABILITY</b> <input type="checkbox"/> UMBRELLA FORM <input type="checkbox"/> OTHER THAN UMBRELLA FORM				EACH OCCURRENCE \$ AGGREGATE \$
	<b>WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY</b>				STATUTORY LIMITS EACH ACCIDENT \$ DISEASE-POLICY LIMIT \$ DISEASE-EACH EMPLOYEE \$
	<b>OTHER</b> A Pollution Liability	AGL35-9214-0039	8/1/92	8/1/93	1,000,000 Aggregate Limit 1,000,000 Each Pollution Incident Limit 10,000 Deductible

**DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS**

Claims Made Form

**CERTIFICATE HOLDER****CANCELLATION**

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE  
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MAIL 10 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE  
LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR  
LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

